

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS**

**Jim Lee,**

Plaintiff,

V.

**Bankroll Capital, Inc.**

Defendant.

**Case No.: 4:21-cv-00433-ALM**

**AMENDED AFFIDAVIT OF JACOB U. GINSBURG**

The Affiant, being duly sworn and upon oath, hereby states the following:

1. I am competent to testify in a court of law and if called to do so would testify as specified herein.
2. I am one of Plaintiff's attorneys in this matter and was retained to represent Plaintiff in a claim against Defendant, pursuant to the Telephone Consumer Protection Act.
3. Defendant, Bankroll Capital, Inc. was served via personal service on on June 10, 2021. See Docket Entry 4.
4. Defendant's answer would have been due July 1, 2021.
5. Neither Defendant nor an attorney for Defendant has reached out to request an extension or to otherwise discuss the case.
6. Despite proper service, as of this date, no answer to Plaintiff's complaint has been filed.
7. Defendant is not a minor, incompetent person, or in the military or foreign service.

FURTHER AFFIANT SAYETH NAUGHT.

/s/ Jacob U. Ginsburg  
Jacob U. Ginsburg

DATED: October 4, 2021